

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES)
OF AMERICA)
Plaintiff)
)
)
V.)
)
MATTHEW MARSH,)
Defendant,)
_____)

CRIMINAL NO. 4:05-cr-40025-FDS

**DEFENDANT'S MOTION FOR ADDITIONAL
FUNDS FOR EXPERT WITNESS**

Defendant Matthew Marsh, pursuant to 18 USC 3006A(e)(1), moves the court to permit allow additional funds for the services of Dr. Ronald Ebert, 222 Forbes Road, Braintree, MA 02184, in connection with a psychological examination that he conducted on the defendant. In support thereof, the defendant submits:

1. The defendant has been declared indigent by the court and is represented by court-appointed counsel.
2. As a result of the presentence report it was clear that the defendant suffered from mental disease and defect and bipolar disorder.
3. It was important that the defendant be examined for purposes of sentencing and possible downward departures.
4. The defendant engaged the services of Dr. Ronald Ebert, of Braintree, MA, a highly qualified and experienced psychologist who has participated in numerous criminal evaluations.

5. Dr. Ebert's services were charged at \$250.00 per hour.
6. Two separate motions for funds in the amounts of \$2,500.00 and \$1,652.50 were allowed.
7. Dr. Ebert spent an hour and a half reviewing the documents that I provided to him prior to visiting Matthew Marsh.
8. Dr. Ebert visited Matthew Marsh on two separate occasions, once on February 1, 2007 for four hours and then again on February 23, 2007 for four hours.
9. In addition Dr. Ebert spent 5.75 hours drafting and finalizing a report for the defendant.
10. Dr. Ebert also provided the Defendant with two affidavits for his motions for new trial in both the Fitchburg District Court and Leominster District Court.
11. There is a remaining balance due to Dr. Ebert in the amount of \$375.00.

Pursuant to 18 USC 3006A(e)(1), the defendant requests the court allow the additional funds for Dr. Ronald Ebert in the amount of \$375.00 for the services he completed for the defendant in this matter.

/s/ Alan J. Black
Alan J. Black, Esquire
Law Offices of Alan J. Black
1383 Main Street
Springfield, MA 01103
(413) 732-5381
BBO # 533768

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the Assistant United States Attorney, Lisa Asiaf on this 7th day of May 2007.

/s/ Alan J. Black

